

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

GWYNETH GILBERT, et al., on behalf of themselves and all others similarly situated,  Plaintiffs,  v.  LANDS' END, INC.  Defendants.	Civil Action No. 3:19-cv-823-JDP
--	----------------------------------

**PLAINTIFFS' SUPPORT OF MOTION FOR CONSOLIDATION AND OPPOSITION  
TO STAY OF LATER-FILED CASES**

Plaintiffs and the proposed class in the above captioned *Gilbert* case support of the motions to consolidate the *Andrews* and *Davis* cases with the first-filed *Gilbert* case, rather than stay the two later filed cases as suggested by Lands' End. (See Dkt. 27, 28 and 29) As the Court correctly noted in the Order scheduling Oral Argument (Dkt. 30), counsel in the *Gilbert* case are in talks with counsel in the *Andrews* case to set up an interim class counsel structure that will enable the attorneys to work together cooperatively. Since the recent filing of the *Davis* case, that counsel has also been included in this discussion.

In the near future we hope to submit a motion for approval of an interim class counsel structure. This will eliminate the Court's concern that three sets of plaintiffs' counsel will be acting simultaneously. Rather, the cooperative efforts among counsel will result in a beneficial and more efficient division of labor. Thus, not only do the cases share common questions of fact and law, but consolidation would serve the interests of judicial economy.

**NAGEL RICE LLP**

By: /s/ Bruce H. Nagel  
Bruce H. Nagel, Esq. (Admitted *Pro Hac Vice*)

Randee M. Matloff, Esq.(Admitted *Pro Hac Vice*)  
103 Eisenhower Parkway  
Roseland, New Jersey 07068  
Telephone: (973) 618-0400  
Facsimile: (973)618-9194  
Email: [bnagel@nagelrice.com](mailto:bnagel@nagelrice.com)  
[rmatloff@nagelrice.com](mailto:rmatloff@nagelrice.com)

**CERASIA & DEL REY-CONE LLP**

Edward Cerasia II, Bar No. 2475127  
150 Broadway, Suite 1517  
New York, New York 10038  
Telephone: (646) 525-4231  
Email: [ed@cdemploymentlaw.com](mailto:ed@cdemploymentlaw.com)

*Attorneys for Plaintiffs  
in Gilbert Action*